

# **EXHIBIT 41**

**ZURICH AMERICAN INSURANCE  
COMPANY, HCC INTERNATIONAL  
INSURANCE COMPANY PLC,  
PHILADELPHIA INDEMNITY  
INSURANCE COMPANY and EVEREST  
REINSURANCE COMPANY,**

**VS.**

***Defendant.***

## 281st JUDICIAL DISTRICT

Number	Date	Description	Offer	Objection	Admit	Not Admitted
<i>Apache/Fieldwood-GOM Documents</i>						
1.	09/30/2013	Decommissioning Agreement <b>DX 32</b>				
2.	09/30/2013	First Amendment to Decommissioning Agreement				
3.	09/30/2013	Second Amendment to Decommissioning Agreement				
4.	04/25/2017	Third Amendment to Decommissioning Agreement				
5.	09/01/2017	Fourth Amendment to Decommissioning Agreement				
6.	04/11/2018	Fifth Amendment to Decommissioning Agreement <b>DX 11</b>				
7.	07/18/2013	Purchase and Sale Agreement [Excerpts] <b>DX 9</b>				
8.	09/2023	Fieldwood Decommissioning Trust A Trust Agreement				

Number	Date	Description	Offer	Objection	Admit	Not Admitted
<b><i>Bankruptcy Pleadings and Documents</i></b>						
9.	01/01/2021	Restructuring Support Agreement, Apache Implementation Term Sheet, Ex G to Disclosure Statement (ECF 723-1 pp. 197-233) [Excerpts only]				
10.	04/15/2021	Amended Disclosure Statement for Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy, LLC and its Affiliates (ECF 1285) [Excerpts only]				
11.	04/15/2021	Exhibit O – FWE I Projections, Amended Disclosure Statement (ECF 1285-2 p. 448) <b>Part of DX 33</b>				
12.	06/25/2021	Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy and its Affiliates (ECF 1732)				
13.	06/15/2021	Plan Supplement, Exhibit H, Apache Definitive Documents (ECF 1562) [Excerpts only]				
14.	06/15/2021	FWE I LLC Agreement, Plan Supplement, Exhibit H, Apache Definitive Documents, Ex 6 (ECF 1562) [Excerpt only]				
15.	06/02/2021	Plan Objection of Zurich American Insurance Company (ECF 1446) [Unredacted, document only, no exhibits]				
16.	06/11/2021	Plan Objection of HCC International Insurance Company PLC (ECF 1537)				
17.	06/02/2021	Plan Objection of Philadelphia Indemnity Insurance Company (ECF 1449)				

Number	Date	Description	Offer	Objection	Admit	Not Admitted
18.	06/02/2021	Plan Objection of Everest Reinsurance Company (ECF 1461)				
19.	06/20/2021	Supplemental Plan Objection of Everest Reinsurance (ECF 1664)				
20.	05/22/21	Adversary Complaint for Declaratory Judgement – filed by Fieldwood Energy and GOM Shelf against Apache, HCCI, Everest and Philadelphia, Case No. 21-03418-MI in U.S. Bankruptcy Court, S.D. Tex. (ECF 1)				
21.	06/25/2023	Findings of Fact, Conclusions of Law and Order Confirming Joint Chapter 11 Plan (ECF 1751)				
22.	06/25/2021	Term Sheet between Apache, Sureties and Debtors, Exhibit B to Order Confirming Plan (ECF 1752-2) <b>DX 13</b>				
23.	08/27/2021	Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Field and its Affiliated Debtors and (II) Occurrence of the Effective Date (ECF 2016)				
<b>Zurich Documents</b>						
24.	11/12/2015	Standby Letter of Credit #839BGC1500968, Deutsche Bank AG New York Branch				
25.	11/12/2015	Standby Letter of Credit #839BGC1500969, Deutsche Bank AG New York Branch				
26.	11/12/2015	Standby Letter of Credit #839BGC1500970, Deutsche Bank AG New York Branch				

Number	Date	Description	Offer	Objection	Admit	Not Admitted
27.	11/12/2015	Standby Letter of Credit #839BGC1500971, Deutsche Bank AG New York Branch				
28.	11/09/2015	Performance Bond No. LPM9181831, Zurich American Ins. Co. <b>Part of DX 12</b>				
29.	11/09/2015	Performance Bond No. LPM9181832, Zurich American Ins. Co. <b>Part of DX 12</b>				
30.	11/09/2015	Performance Bond No. LPM9181833, Zurich American Ins. Co. <b>Part of DX 12</b>				
31.	11/09/2015	Performance Bond No. LPM9181834, Zurich American Ins. Co. <b>Part of DX 12</b>				
32.	09/18/2014	General Agreement of Indemnity				
33.	11/09/2015	Continuing Agreement for Standby Letters of Credit				
<b>HCCI Documents</b>						
34.	01/04/2016	Continuing Agreement for Standby Letter of Credit				
35.	01/14/2016	General Indemnity Agreement				
36.	04/27/2016	Participation Agreement				
37.	05/23/2016	Standby Letter of Credit #839BGC1600430, Deutsche Bank AG New York Branch				
<b>Philadelphia Documents</b>						
38.	09/27/2018	Payment Bond No. PB03251500040 <b>DX 3</b>				
39.	09/26/2018	General Indemnity Agreement Commercial Surety				
<b>Everest Documents</b>						
40.	09/27/2018	Bond No. ES00001441 <b>DX 2</b>				

Number	Date	Description	Offer	Objection	Admit	Not Admitted
41.	08/20/2018	Agreement of Indemnity; Everest Document				
<b><i>Apache/Surety/GOM Settlement Documents</i></b>						
42.	08/27/2021	Subrogation, Subordination and Payment Agreement <b>DX 5</b>				
43.	08/10/2021	Information Sharing Letter Agreement				
44.	08/27/2021	Apache Surety Consent Letter				
45.	08/27/2021	Farmout Agreement				
46.		<b>RESERVED</b>				
47.	08/17/2021	Stipulation and Order Dismissing Adversary Proceeding – Case No. 21-03418-MI (ECF 41)				
<b><i>GOM Shelf Post-Bankruptcy Operations (Apache copied on/received all docs)</i></b>						
48.	02/15/2022	Monthly Operating Report of GOM Shelf – January 2022				
49.	02/22/2023	Monthly Operating Report of GOM Shelf – January 2023				
50.	06/22/2023	Monthly Operating Report of GOM Shelf – May 2023				
51.	11/01/2022	Arena – GOM Purchase & Sale Agreement				
<b><i>Additional Documents</i></b>						
52.		Certification of Rights - Jon Graham				
53.		<b>RESERVED</b>				
<b><i>GOM Shelf/BOEM P&amp;A Default Documents</i></b>						
54.	09/08/2021	Letter from GOM Shelf to BOEM/BSSE re Notice of Default				
55.	02/22/2022	Letter from GOM Shelf to BOEM/BSEE re Additional Notice of Default <b>DX 19</b>				
56.	04/05/2022	Letter from GOM Shelf to BOEM/BSEE re Amended Notice of Default <b>DX 20</b>				

Number	Date	Description	Offer	Objection	Admit	Not Admitted
<i>Apache P&amp;A Default Documents</i>						
56.1	01/04/2023	Email – D Brescia to D. Peterman and J Graham re status request <b>DX 21</b>				
57.	01/23/2023	Email – B Cupit to D. Brescia re Trust A Reimbursements (w/o attachments)				
58.	03/01/2023	Email - B Cupit to D. Brescia re Trust A Reimbursements (w/o attachments)				
59.	02/28/2022, 03/24/2022, 04/05/2022, 05/20/2022, 01/23/2023	Secondary Beneficiary Demands for Reimbursement from Trust A				
60.	06/23/2022, 07/29/2022, 08/23/2022, 09/22/2022, 10/20/2022, 11/18/2022, 12/21/2022, 01/23/2022	Letters to Trust A for Reimbursement				
61.	03/09/2022, 06/07/2022, 07/14/2022, 08/05/2022, 09/07/2022, 10/05/2022, 11/03/2022, 12/06/2022, 01/05/2023	Seller Notices of Reimbursable Event <b>Part of DX 40</b>				
62.	04/18/2022	Email – B. Cupit to D. Brescia re expected P&A after defaults / consent request				
63.	04/19/2022	Email – B. Cupit to D. Brescia re corrected Leases – Order Received				

Number	Date	Description	Offer	Objection	Admit	Not Admitted
64.	04/19/2022	Email – B. Cupit to D. Brescia re (1 of 4) Decommissioning Orders Received				
65.	04/19/2022	Email – B. Cupit to D. Brescia re (2 of 4) Decommissioning Orders received				
66.	04/19/2022	Email – B. Cupit to D. Brescia re (3 of 4) Decommissioning Orders Received				
67.	04/19/2022	Email – B. Cupit to D. Brescia re (4 of 4) Decommissioning Orders Received				
68.	04/27/2022	Email – B. Cupit to D. Brescia re justification of consent request				
69.	06/14/2022	Email – B. Cupit to D. Brescia re consent request				
70.	07/05/2023	Letter – D. Brescia to J. Graham re latest draws on Trust A				
70.1	07/05/2023	Letter – D. Brescia to G. Harrison re latest draws on Trust A				
<b><i>Correspondence Among Parties re GOM Post-Bankruptcy Performance/Demand</i></b>						
71.	02/18/2022	Letter – D. Brescia to D. Peterman re letter demand				
72.	04/06/2022	Letter – D. Peterman to D. Brescia re response to Surety 2-18-22 letter Demand				
73.	07/06/2022	Letter – D. Brescia to J. Graham re GOM evaluation <b>DX 14</b>				
74.	09/21/2022	Email – J. Graham to D. Brescia re new project evaluation				
75.	10/12/2022	Email – J. Graham to D. Brescia re new operator and sale of assets				
76.	11/21/2022	Email – J. Graham to D. Brescia re status request				



Number	Date	Description	Offer	Objection	Admit	Not Admitted
77.	03/02/2023	Letter – D. Brescia to J. Graham re Surety information request				
78.	04/07/2023	Email – A. Noebels to D. Brescia re backup for draw requests <b>DX 31</b>				
79.	04/19/2023	Email – A. Noebels to D. Brescia re backup for draw requests <b>DX 30</b>				
80.	05/05/2023	Email – exchange between D. Peterman, J. Graham and D. Brescia re GOM refusal to pursue sale effort				
81.	07/07/2023	Testimony Subpoena and Subpoena Duces Tecum to Non-Party Jon Graham				
82.	07/11/2023	Affidavit of Service of Testimony Subpoena and Subpoena Duces Tecum to Non-Party Jon Graham				
83.	06/06/2016	Zurich Underwriting Communication				

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a copy of this filing has been served on July 11, 2023, on all counsel of record via e-service.

/s/ Adam R. Diamond

Adam R. Diamond

**Automated Certificate of eService**

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Filing Code Description: No Fee Documents

Filing Description: Plaintiffs' Amended Preliminary Proposed Stipulated

Exhibit List

Status as of 7/11/2023 2:49 PM CST

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